

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
MICHELLE LO (NYRN 4325163)
Chief, Civil Division
MICHAEL A. KEOUGH (NYRN 5199666)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-6570
Email: michael.keough@usdoj.gov

Attorneys for the United States of America

JABA TSITSUASHVILI (CABN 309012)
PATRICK JAICOMO (MIBN P-75705)*
INSTITUTE FOR JUSTICE
901 N. Glebe Road, Suite 900
Arlington, Virginia 22203
Tel: (703) 682-9320
Fax: (703) 682-9321
jtsitsuashvili@ij.org
pjaicomo@ij.org

**Admitted pro hac vice*

ANNA M. BARVIR (CABN 268728)
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, California 90802
Tel: (562) 216-4444
Fax: (562) 216-4445
abarvir@michellawyers.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RENÉ QUIÑONEZ and MOVEMENT INK
LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 3:22-CV-03195-WHO

**STIPULATION REGARDING RESPONSE
DATE AND CASE MANAGEMENT
CONFERENCE; ~~PROPOSED~~ ORDER**

Pursuant to Civil Local Rules 6-2(a) and 7-12, and subject to the Court's approval, Plaintiffs René Quiñonez and Movement Ink LLC ("Plaintiffs") and Defendant the United States of America (together, the "Parties"), hereby stipulate and request that the Court adopt the following modifications to the case schedule:

STIPULATION REGARDING RESPONSE DATE AND CMC DATE
Case No: 3:22-cv-03195-WHO

Amendments per Dkt. 80:	July 31, 2023
Answer:	August 31, 2023
Case Management Conference statement due:	October 10, 2023
Case Management Conference:	October 17, 2023, 2:00 p.m.

The proposed schedule above addresses upcoming unavailability of counsel due to travel out of the country by Plaintiffs' lead counsel and parental leave by Defendants' counsel. The Parties have met and conferred and respectfully submit that the proposed schedule will conserve the resources of the Parties and the Court while ensuring the speedy resolution of this matter.

SO STIPULATED.

DATED: July 7, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Michael A. Keough
MICHAEL A. KEOUGH
Assistant United States Attorney

Attorneys for the United States of America

/s/ Jaba Tsitsuashvili*
JABA TSITSUASHVILI
INSTITUTE FOR JUSTICE

Attorney for Plaintiffs

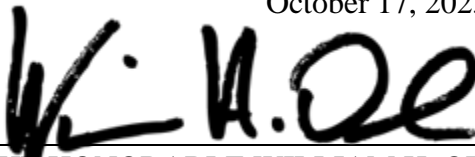
** In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The parties shall comply with the following case deadlines:

Amendments per Dkt. 80:	July 31, 2023
Answer:	August 31, 2023
Case Management Conference statement due:	October 10, 2023
Case Management Conference:	October 17, 2023, 2:00 p.m.

DATE: July 10, 2023



THE HONORABLE WILLIAM H. ORRICK
United States District Judge